

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	CRIMINAL NO. <b>1:05cr414</b>
	)	
v.	)	
	)	
<b>AGNI LISA BROWN,</b>	)	
<b>a/k/a: Agni Lisa Graham</b>	)	
<b>"Michelle"</b>	)	
<b>"Lisa,"</b>	)	
	)	
Defendant.	)	

**STATEMENT OF FACTS**

Were this case to go to trial, the government would prove beyond a reasonable doubt by competent and admissible evidence the following:

1. From in or about June 1997, to in or about April 2005, in Springfield, Virginia, in the Eastern District of Virginia and elsewhere, defendants **AGNI LISA BROWN, a/k/a: Agni Lisa Graham, "Michelle," & "Lisa"** (hereinafter: **BROWN**) And Maria Antoinetta Mourizaki, a/k/a: "Tonia" (Hereinafter: Mourizaki) knowingly, willfully, and unlawfully combined, conspired, confederated and agreed together with each other to commit offenses against the United States of America, namely, to violate Title 18, United States Code, Sections 2421, and Section 2422(a) by knowingly transporting and causing to be transported individuals in interstate commerce with intent that such individuals engage in prostitution and by knowingly inducing and enticing individuals

to travel in interstate commerce to engage in prostitution and illegal sexual activity.

2. During the period of the conspiracy, **BROWN** and Mourizaki hired prostitutes from outside Virginia, assisted in their transportation to Virginia and housed some of them at the brothel located at 7623 Fullerton Road, Springfield, Virginia, which was open for business Monday through Saturday from approximately 9:00 a.m. until 10:00 p.m.

3. **BROWN** and Mourizaki would charge customers set fees for the services of prostitutes which would be collected from the customers, and the prostitutes would collect "tips" from their customers, which they were allowed to keep. They kept records reflecting visits by customers to prostitutes, which included the names of the prostitutes and how long each customer spent with them.

4. **BROWN** used moneys obtained from prostitution to lease the building located at 7623 Fullerton Road, Springfield, Virginia, in which to conduct brothel operations, to pay for utilities and maintenance for that building, and to pay for newspaper advertisements. In that regard, from January 2000, to December 2003, defendant **BROWN** paid rent of \$1,000 a month to Willard Wilcox for the premises at 7623 Fullerton Road, Springfield, Virginia, in which the brothel operated, and from January 2004, to March 2005, she paid rent of \$1,100 a month.

5. From January 2002, to March 2005, defendant **BROWN** placed ads in the "Adult Employment" section of the *Washington City Paper* offering employment and listing a telephone number to call that came back to 7623 Fullerton Road, Springfield, Virginia. During that same period, defendant **BROWN** placed ads in the "Adult Services" section of the *Washington City Paper* offering a friendly international staff and rooms and showers for relaxation and listing a telephone number to call that came back to 7623 Fullerton Road, Springfield, Virginia.

6. On February 25, 2005, defendant **BROWN** interviewed and hired FBI Special Agent "M. W.," who was acting in an undercover capacity, to work as a prostitute at the brothel located at 7623 Fullerton Road, Springfield, Virginia. On March 15, 2005, defendant **BROWN** put "C. K." a/k/a: "Lindsey," to work as a prostitute at the brothel, and on April 1, 2005, defendant **BROWN** interviewed and hired "F. M." a/k/a: "Jasmine" to work as a prostitute at the brothel. In 2000, defendant **BROWN** interviewed and first hired "A. W." a/k/a: "Rene" to work as a prostitute at the brothel, and on at least three occasions between January 2004, and August 2004, defendant **BROWN** rehired and reemployed "A. W." a/k/a: "Rene" to work as a prostitute at the brothel.

7. From January 2000 to May 2005, defendant **BROWN** maintained five bank accounts at the Burke and Herbert Bank and five bank accounts at the Suntrust Bank into which she made regular cash deposits.

8. On July 7, 2002, defendant **AGNI LISA BROWN** purchased a 1999 Ford Expedition, paying for it with a cashiers check in the amount of \$13,504.56. The check was issued by the Alexandria, Virginia, branch of Burke & Herbert bank from funds in two of **BROWN's** accccounts at that bank. The moneys in these two accounts represented the proceeds of the operation of the brothel at 7623 Fullerton Road and as such were criminally derived from violations of Title 18, United States Code, Sections 2421 and Section 2422, which are specified unlawful activities. The transactions were by, through or to a financial institution affecting interstate and foreign commerce.

9. Defendant **BROWNS** actions as described above were done knowingly, willfully and unlawfully and not as a result of accident, mistake or other innocent reason.

Respectfully submitted,

Paul J. McNulty  
United States Attorney

By: Michael E. Rich/Erik R. Barnett  
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between me and the United States, I hereby stipulate that the above Statement of Facts is true and

accurate, and that had the matter proceeded to trial, the United States could have proved the same beyond a reasonable doubt.

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Agni Lisa Brown  
Defendant

I am **AGNI LISA BROWN's** attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.

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Martin Mooradian